

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FT. WORTH DIVISION**

U.S. PASTOR COUNCIL, et al.,

Plaintiffs,

v.

EQUAL EMPLOYMENT OPPORTUNITY
COMMISSION, et al.,

Defendants.

Case No. 4:18-cv-00824-O

MOTION FOR LEAVE TO FILE JOINT STATUS REPORT OUT OF TIME

Defendants hereby respectfully request that the Court accept the Joint Status Report attached herewith out of time, on this date, March 12, 2019. Undersigned counsel regrets any inconvenience caused to the Court by this belated filing, and apologizes for failing to meet the schedule set by the Court. This error occurred when undersigned counsel erroneously recorded the task as completed on his “to-do” list upon completing the preparation of the Joint Status Report (a task that counsel for the parties had agreed would be assigned to him), rather than upon filing of the document, as should have occurred.

Undersigned counsel acknowledges that this Court takes the deadlines it sets seriously and will ensure that subsequent filings are timely.

A proposed order, and the Joint Status Report for which leave to file is sought, are attached.

Dated: March 12, 2019

Respectfully submitted,

JOSEPH H. HUNT
Assistant Attorney General

JOSHUA GARDNER
Senior Litigation Counsel

/s/
ERIC J. SOSKIN (PA Bar #200663)
Senior Trial Counsel
Federal Programs Branch
U.S. Department of Justice, Civil Division
1100 L Street, NW Rm. 12002
Washington, DC 20530
Telephone: (202) 353-0533
Fax: (202) 616-8470
Email: Eric.Soskin@usdoj.gov
Counsel for Defendants

CERTIFICATE OF CONFERENCE

Pursuant to Local Civil Rule 7.1(b), counsel for Defendants has conferred with counsel for Plaintiffs regarding the relief sought in this motion, and Plaintiffs do not oppose the requested relief.

/s/ Eric J. Soskin
Eric J. Soskin
Senior Trial Counsel